

FINKELSTEIN FILLER, LLP

Attorneys at Law

666 Fifth Avenue, 15th Floor
New York, New York 10103
917-846-9349
Edward.Finkelstein@efmflaw.com

MAILING ADDRESS
1610 Richmond Road
Staten Island, New York 10304
718-448-8808 (Direct)
212-320-0345 (Fax)

February 3, 2020

BY ECF

Hon. Raymond J. Dearie
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Windward Bora, LLC v. Jain, et al.*
18-CV-1844 (RJD) (JO)

Dear Judge Dearie:

We represent Defendant PCN, LLC ("PCN"). Pursuant to Your Honor's prior directive, we write to provide a status update on Plaintiff's State Court Expungement Action. PNC Bank (the entity that filed the subject mortgage satisfaction) and PCN have served discovery demands. A revised schedule concerning responses to discovery demands and depositions was set by the Court at a January 30, 2020 conference. The next a status conference in Plaintiff's State Court Expungement Action is scheduled for April 2, 2020. Given the foregoing, it is respectfully suggested that the next status report be required on or after April 3, 2020.

Thank you for your consideration.

Respectfully submitted,

Edward R. Finkelstein

Edward R. Finkelstein

cc: Danielle P. Light, Esq. (BY ECF)
Thomas R. Dominczyk, Esq. (BY ECF)